

1 JASON M. FRIERSON  
United States Attorney  
2 Nevada Bar No. 7709  
JULIE A.K. CUMMINGS, SBN HI 10635  
3 Special Assistant United States Attorney  
Office of Program Litigation, Office 7  
4 Social Security Administration  
6401 Security Boulevard  
5 Baltimore, MD 21235  
Telephone: (410) 966-1551  
6 Facsimile: (415) 744-0134  
E-Mail: Julie.Cummings@SSA.gov  
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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 SALENA ELLEN YANEZ,

12 Plaintiff,

13 vs.  
14

15 MARTIN O'MALLEY,  
Commissioner of Social Security,

16 Defendant.  
17

Case 2:24-cv-01416-BNW

UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(*FIRST REQUEST*)

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19 Defendant, the Commissioner of Social Security, respectfully requests an extension of 30  
20 days in which to respond to Plaintiff's Brief (ECF No. 11), filed on October 30, 2024, changing  
21 the date on which Defendant's response is due to from November 29, 2024, to December 30, 2024.  
22 This is Defendant's first request for an extension to respond to Plaintiff's motion. Counsel for  
23 Defendant conferred with a representative for counsel for Plaintiff on November 20, 2024, and  
24 confirmed that Plaintiff has no objection to this request.

25 Defendant makes this request in good faith and for good cause. I request this extension in  
26 order to further consider the administrative record in light of the issues raised in Plaintiff's brief.  
27 While I have been diligently trying to complete the review of this case file, I additionally have had  
28 several briefs due in recent days in this and other district courts. In the next month, I have eight

1 more briefs due in various district courts of the Ninth Circuit, including this one. Accordingly, I  
2 ask the Court for more time so that I can properly represent the Commissioner in this and my other  
3 matters.

4 For these reasons, the Commissioner respectfully requests that the Court grant this motion  
5 for an extension of 30 days for Defendant to respond to Plaintiff's Opening Brief.

6 DATED November 20, 2024.

Respectfully submitted,

7 JASON M. FRIERSON  
8 United States Attorney

9 s/ Julie A.K. Cummings  
10 JULIE A.K. CUMMINGS  
11 Special Assistant United States Attorney  
12 Office of Program Litigation, Office 7

13 Attorneys for Defendant

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16 IT IS SO ORDERED:

17 Brenda Weksler  
18 HON. BRENDA WEKSLER  
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: November 21, 2024  
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